

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

CHERYL YVETTE JERNIGAN,  
Plaintiff,  
v.  
CHARLES B. McMILLAN, et al,  
Defendants.

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NO. 3:22-CV-02580-N-BN

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DEFENDANTS GOOGLE LLC AND YOUTUBE LLC'S  
NOTICE OF NO OPPOSITION TO  
PLAINTIFF'S REQUEST FOR PARTIAL DISMISSAL WITH PREJUDICE ORDER

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Defendants Google LLC ("**Google**") and YouTube LLC (collectively, "**You**T**ube**")<sup>1</sup> hereby file their Notice of No Opposition to Plaintiff's Request for Partial Dismissal with Prejudice Order.

On July 7, 2023, Plaintiff Cheryl Y. Jernigan ("**Plaintiff**") filed her Request for Partial Dismissal with Prejudice Order (Dkt. No. 47) (the "**Motion**") requesting the dismissal with prejudice of Mr. Sundar Pichai, CEO of Google, LLC, and YouTube. YouTube is not opposed to the relief requested by Plaintiff in her Motion.

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<sup>1</sup> The live complaint is the Second Amended Complaint attached to Plaintiff's Motion to Amend Summons and Complaint (ECF No. 38). First, the Complaint (ECF No. 38) incorrectly identifies "Sundar Pichai, CEO, Google, LLC" as a party. No claims or allegations are asserted against Mr. Pichai. He is not a proper party to the suit, and no service has been obtained on Mr. Pichai. Second, Google executed a waiver of service on its behalf after being served with the request on "Google, LLC d/b/a YouTube." In the executed waiver of service, it was made clear that YouTube LLC is not a d/b/a for Google. (ECF 43.) However, YouTube LLC is a wholly owned subsidiary of Google.

Dated: July 14, 2023

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

By: /s/ Tricia W. Macaluso

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2023, the foregoing was filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing sent to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Tricia W. Macaluso

Tricia W. Macaluso